

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)**

In Re:

Aligned Development, LLC
Debtor(s)

Case No. 24-11929-LSS
Chapter 11

WCP Fund I, LLC, as Servicer for
Pacific RBLF Funding Trust
Movant,

v.

Aligned Development, LLC
Respondent.

**RESPONDENT'S OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC
STAY**

Comes now the defendant Aligned Development, LLC by and through its attorney Richard Basile and in opposition to Movant's Motion for Automatic Stay states:

1. The allegations of Movant are generally denied, although monies are due and owing to the Movant.
2. The allegations of Movant are irrelevant to the granting of relief from automatic stay.
3. The debtor at this point in time is not yet required to file a plan of reorganization.
4. The debtor has opened a debtor in possession account.
5. The debtor will be funding his plan of reorganization through a refinance of the debtor's property.
6. There is equity in the property and the property is necessary for reorganization.

7. There is adequate protection for the Movant who is a creditor secured by a deed of trust encumbering debtor's real estate.
8. The debtor has no leases or executory contracts and thus there are no leases or executory contracts to schedule.
9. The Movant's motion is premature at the present time.

Wherefore, Debtor moves this Court to deny Movant's Motion for Relief from Automatic Stay.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3 day of July, 2024, a copy of the foregoing Opposition to Motion for Relief from Automatic Stay was sent via first class mail, postage prepaid, and/or sent via email to:

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